

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 21-cv-10928
Honorable Denise Page Hood

vs.

\$3,840,772.58 U.S. dollars constituting
125 international wire transfers seized
from U.S. correspondent bank, Citibank,
between December 21, 2020 and
January 4, 2021,

\$1,025,446.18 U.S. dollars constituting
42 international wire transfers seized
from U.S. correspondent bank, JPMorgan
Chase Bank, between December 21, 2020
and January 4, 2021,

\$765,143.73 U.S. dollars constituting
40 international wire transfers seized
from U.S. correspondent bank, Bank of
New York Mellon, between December 21, 2020
and January 4, 2021,

\$145,466.52 U.S. dollars constituting
6 international wire transfers seized
from U.S. correspondent bank, Mashreq
Bank PSC, between December 21, 2020
and January 4, 2021,

\$387,337.51 U.S. dollars constituting
13 international wire transfers seized
from U.S. correspondent bank, Standard
Chartered Bank, between December 21, 2020
and January 4, 2021,

\$159,616.77 U.S. dollars constituting
6 international wire transfers seized
from U.S. correspondent bank, Deutsche
Bank Trust Company Americas, between
December 21, 2020 and January 4, 2021,

\$2,288,936.63 U.S. dollars constituting
67 wire transfers seized from U.S.
correspondent bank, Citibank, N.A.,
between May 3, 2021 and May 21, 2021,

\$1,449,112.82 U.S. dollars constituting
44 wire transfers seized from U.S.
correspondent bank, JPMorgan Chase Bank,
between May 3, 2021 and May 21, 2021,

\$1,348,713 U.S. dollars constituting
44 wire transfers seized from U.S.
correspondent bank, Bank of America,
between May 3, 2021 and May 21, 2021,

\$636,373.90 U.S. dollars constituting
28 wire transfers seized from U.S.
correspondent bank, Bank of New York Mellon,
between May 3, 2021 and May 21, 2021,

\$20,155 U.S. dollars constituting
2 wire transfers seized from U.S.
correspondent bank, Deutsche Bank
and Trust Company Americas, between
May 3, 2021 and May 21, 2021, and

\$34,000 U.S. dollars constituting
2 wire transfers seized from U.S.
correspondent bank, Mashreq Bank PSC,
between May 3, 2021 and May 21, 2021,

Defendants *in rem*.

Certificate of Service

It is hereby certified that service of the **Second Amended Complaint for Forfeiture, Warrant(s) of Arrest and Notices In Rem**, and this **Certificate of Service** has been made on October 22, 2021, upon the following individuals:

Paul Saluja
Counsel for New China Success
Limited P.O. Box 3856
Charleston, WV 25338

via regular and certified mail, by placing the same in an envelope, postage prepaid, and depositing said envelope(s) in the United States Mail.

Respectfully submitted,

Saima S. Mohsin
Acting United States Attorney



Gjon Juncaj (P63256)
Assistant U.S. Attorney
211 W. Fort Street, Ste. 2001
Detroit, Michigan 48226
(313) 226-0209
Gjon.Juncaj@usdoj.gov